

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

ELG, a minor by Parent and
Next Friend LATOREYA TILL,

Plaintiff,

vs.

JUDGE KENNETH KING,
individually; UNIVERSAL
PROTECTION SERVICES d/b/a
ALLIED UNIVERSAL SECURITY
SERVICES and/or ALLIED
UNIVERSAL SECURITY SERVICES,
LLC; JOHN DOE COURT OFFICER,
individually; and JANE ROE COURT
OFFICER individually,

Defendants.

Civil No. 24-cv-12195

ANSWER TO COMPLAINT

Honorable David M. Lawson

ANSWER TO COMPLAINT

Defendant Hon. Kenneth King, by and through his attorneys, THE PERKINS LAW GROUP, PLLC, and TODD RUSSELL PERKINS hereby submits his Answer to Plaintiff's Complaint, and state as follows:

JURISDICTION

1. Deny.
2. Admit.
3. Admit.
4. Admit.

5. Deny.

6. Paragraph 6 states a legal conclusion, and neither requires an admittance or denial.

PARTIES AND VENUE

7. Deny.

8. Paragraph 8 neither requires an admittance or denial.

9. Admit.

10. Defendant lacks knowledge of the allegations contained in paragraph 10, and therefore denies.

11. Defendant lacks knowledge of the allegations contained in paragraph 11, and therefore denies.

12. Deny.

13. Admit.

14. Admit

FACTUAL ALLEGATIONS

15. Admit.

16. Admit.

17. Defendant lacks knowledge of the allegations contained in paragraph 12, and therefore denies.

18. Admit.

19.Deny.

20.Admit.

21.Deny as to the classification as Defendant King as a lecturer.

22.Defendant lacks knowledge of the allegations contained in paragraph 12, and therefore denies.

23.Defendant lacks knowledge of the allegations contained in paragraph 12, and therefore denies.

24.Defendant lacks knowledge of the allegations contained in paragraph 12, and therefore denies.

25.Admit.

26.Deny.

27.Deny.

28.Deny.

29.Deny.

30.Deny.

31.Defendant lacks knowledge of the allegations contained in paragraph 12, and therefore denies.

32.Deny.

33.Defendant lacks knowledge of the allegations contained in paragraph 12, and therefore denies.

34.Admit.

35.Deny.

36.Deny.

37.Deny.

38.Deny.

39.Deny.

40.Defendant lacks knowledge of the allegations contained in paragraph 12, and therefore denies.

41.Defendant lacks knowledge of the allegations contained in paragraph 12, and therefore denies.

42.Defendant lacks knowledge of the allegations contained in paragraph 12, and therefore denies.

43.Defendant lacks knowledge of the allegations contained in paragraph 12, and therefore denies.

44.Deny.

45.Defendant lacks knowledge of the allegations contained in paragraph 12, and therefore denies.

46.Deny.

47.Deny.

48.Deny.

49.Deny.

50.Deny.

51.Deny.

52.Deny.

53.Deny.

54.Deny.

DUE PROCESS

55.Paragraph 55 neither requires an admittance or denial.

56.Paragraph 56 states a legal conclusion and leaves Plaintiff to her proofs.

57.Paragraph 57 states a legal conclusion and leaves Plaintiff to her proofs.

58.Paragraph 58 states a legal conclusion and leaves Plaintiff to her proofs.

59.Paragraph 59 states a legal conclusion and leaves Plaintiff to her proofs.

60.Paragraph 60 states a legal conclusion and leaves Plaintiff to her proofs.

61.Paragraph 61 states a legal conclusion and leaves Plaintiff to her proofs.

62.Deny.

63.Deny.

64.Deny.

65.Paragraph 65 states a legal conclusion and leaves Plaintiff to her proofs.

66.Deny.

67.Deny.

68.Paragraph 68 states a legal conclusion and leaves Plaintiff to her proofs.

69.Deny.

70.Deny.

71.Paragraph 71 states a legal conclusion and leaves Plaintiff to her proofs.

72.Deny.

73.Deny.

74.Deny.

75.Deny.

76.Deny.

77.Deny.

78.Paragraph 78 states a legal conclusion and leaves Plaintiff to her proofs.

79.Deny.

80.Deny,

81.Deny.

82.Deny.

83.Deny.

84.Deny.

85.Deny.

86.Deny.

87.Deny.

88.Deny.

89.Deny.

90.Deny.

91.Deny.

92.Deny.

LACK OF IMMUNITY

93.Paragraph 93 neither requires an admittance or denial.

94.Paragraph 94 neither requires an admittance or denial.

95.Paragraph 95 states a legal conclusion and leaves Plaintiff to her proofs.

96.Paragraph 96 states a legal conclusion and leaves Plaintiff to her proofs.

97.Paragraph 97 states a legal conclusion and leaves Plaintiff to her proofs.

98.Paragraph 98 states a legal conclusion and leaves Plaintiff to her proofs.

99.Paragraph 99 states a legal conclusion and leaves Plaintiff to her proofs.

100. Paragraph 100 states a legal conclusion and leaves Plaintiff to her proofs.

101. Paragraph 101 states a legal conclusion and leaves Plaintiff to her proofs.

102. Admit.

103. Paragraph 103 neither requires an admittance or denial.

104. Paragraph 104 neither requires an admittance or denial.

105. Deny.

106. Paragraph 101 states a legal conclusion and leaves Plaintiff to her proofs.

107. Deny.

108. Deny.

109. Deny.

110. Deny.

111. Deny.

112. Deny.

113. Deny.

114. Deny.

115. Deny.

**COUNT I – DEFENDANT JUDGE KENNETH KING – MALICIOUS
PROSECUTION IN VIOLATION OF THE 4TH AMENDMENT**

116. Paragraph 116 neither requires an admittance or denial.

117. Deny.

118. Paragraph 118 states a legal conclusion and leaves Plaintiff to her proofs.

119. Paragraph 119 states a legal conclusion and leaves Plaintiff to her proofs.

120. Deny.

121. Deny.

122. Deny.

123. Deny.

124. Deny.

125. Deny.

**COUNT II -- DEFENDANT JUDGE KENNETH KING – UNLAWFUL
ARREST AND INCARCERATION IN VIOLATION OF THE 4TH
AMENDMENT**

126. Paragraph 126 neither requires an admittance or denial.

127. Paragraph 127 states a legal conclusion and leaves Plaintiff to her proofs.

128. Paragraph 128 states a legal conclusion and leaves Plaintiff to her proofs.

129. Paragraph 128 states a legal conclusion and leaves Plaintiff to her proofs.

130. Paragraph 130 states a legal conclusion and leaves Plaintiff to her proofs.

131. Deny.

132. Deny.

133. Deny.

134. Deny.

135. Deny.

136. Deny.

137. Deny.

138. Deny.

139. Deny.

140. Deny.

**COUNT III -- DEFENDANT JUDGE KENNETH KING – INTENTIONAL
INFLICTION OF EMOTIONAL DISTRESS**

141. Paragraph 141 neither requires an admittance or denial.

142. Deny.

143. Deny.

144. Deny.

145. Deny.

146. Deny.

**COUNT IV-DEFENDANT JUDGE KENNETH KING
– INVASION OF PRIVACY**

147. Paragraph 147 neither requires an admittance or denial.

148. Deny.

149. Deny.

150. Deny.

151. Deny.

152. Deny.

153. Deny.

154. Deny.

155. Deny.

156. Deny.

157. Deny.

158. Deny.

159. Deny.

**COUNT V – DEFENDANT JUDGE KENNETH KING – FALSE ARREST
AND IMPRISONMENT**

160. Paragraph 160 neither requires an admittance or denial.

161. Deny.

162. Deny.

163. Deny.

164. Deny.

165. Deny.

**COUNT VI – DEFENDANTS JOHN DOE &
JANE ROE COURT OFFICERS – FOURTH AMENDMENT UNLAWFUL
SEIZURE & DETENTION**

166. Paragraph 166 neither requires an admittance or denial.

167. Paragraph 167 states a legal conclusion and leaves Plaintiff to her proofs.

168. Paragraph 168 states a legal conclusion and leaves Plaintiff to her proofs.

169. Paragraph 169 states a legal conclusion and leaves Plaintiff to her proofs.

170. Paragraph 170 states a legal conclusion and leaves Plaintiff to her proofs.

171. Deny.

172. Deny.

173. Deny.

174. Deny.

175. Deny.

176. Deny.

177. Defendant lacks knowledge of the allegations contained in paragraph 177,
and therefore denies

178. Defendant lacks knowledge of the allegations contained in paragraph 178, and therefore denies

179. Deny.

180. Deny.

181. Deny.

182. Deny.

183. Deny.

184. Deny.

**COUNT VII – DEFENDANTS JOHN DOE &
JANE ROE COURT OFFICERS – FALSE ARREST & IMPRISONMENT**

185. Paragraph 185 neither requires an admittance or denial.

186. Deny.

187. Deny.

188. Deny.

189. Deny.

190. Deny.

191. Deny.

**COUNT VIII -- DEFENDANT UNIVERSAL – VICARIOUS LIABILITY
FOR STATE LAW TORTS**

192. Paragraph 192 neither requires an admittance or denial.

193. Deny.

194. Deny.

REQUESTED RELIEF

Defendant humbly request this court find no cause of action and dismiss Plaintiff's Complaint in its entirety.

Dated: November 14, 2024

/s/Todd R. Perkins

TODD RUSSELL PERKINS (P55623)

THE PERKINS LAW GROUP, PLLC

Attorney for Defendant

615 Griswold, Suite 400

Detroit, Michigan 48226

(313) 964-1702

tperkins@perkinslawgroup.net

AFFIRMATIVE DEFENSES AND OTHER DEFENSES

Defendant Kenneth King states as follows for his affirmative defenses to Plaintiff's First Amended Complaint:

1. Plaintiff's Complaint fails to state a claim against Defendant upon which relief can be granted.
2. Plaintiff's claims are barred by the doctrine of absolute judicial immunity.
3. To the extent it alleges a violation arising under the Constitution of the United States for alleged violations of the Fourth Amendment, Plaintiff's Complaint fails to state a claim against Defendant upon which relief may be granted and there is no genuine issue of material fact.
4. That the sole proximate cause, or at least a contributing cause, of the damages and/or injuries complained of by Plaintiff were of her own wrongful conduct, negligence, or comparative fault.
5. Plaintiff's claims fail as a matter of law because Plaintiff did not suffer any constitutional deprivation.
6. In all respects, Defendant's actions were in good faith, reasonable, proper, and legal.
7. Any injury suffered by Plaintiff was proximately caused by her own wrongful conduct.

8. That the sole proximate cause, or at least a contributing cause, of the damages and/or injuries complained of by Plaintiff was the actions of third parties.

Defendant reserves the right to assert additional affirmative defenses as they are revealed in the course of this proceeding.

Dated: November 14, 2024

/s/Todd R. Perkins

TODD RUSSELL PERKINS (P55623)

THE PERKINS LAW GROUP, PLLC

Attorney for Defendant

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JUDGE KENNETH KING,
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JURY DEMAND

Honorable David M. Lawson

JURY DEMAND

Defendant Hon. Kenneth King, by and through his attorneys, THE PERKINS
LAW GROUP, PLLC, and TODD RUSSELL PERKINS hereby submits his Jury
Demand, and state as follows:

Dated: November 14, 2024

/s/Todd R. Perkins

TODD RUSSELL PERKINS (P55623)

THE PERKINS LAW GROUP, PLLC

Attorney for Defendant

615 Griswold, Suite 400

Detroit, Michigan 48226

(313) 964-1702

tperkins@perkinslawgroup.net

CERTIFICATE OF SERVICE

I, Todd Perkins, hereby certify that on November 14, 2024, I filed the foregoing Answer, Affirmative Defenses and Reliance on a Jury Demand, to Clerk of Court and all parties of record via the electronic filing system.

Respectfully Submitted,

PERKINS LAW GROUP, PLLC

/s/: Todd Perkins

TODD RUSSELL PERKINS

Attorney for Defendant

615 Griswold Street, Suite 400

Detroit, Michigan 48226

(313) 964-1702